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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Guidelines for Evaluating the Environmental
Effects of Radiofrequency Radiation

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ET Docket No. 93-62

REQUEST FOR EXTENSION OF COMPLIANCE DEADLINE

Ameritech Mobile Communications, Inc. (Ameritech), hereby requests that the Commission issue a blanket extension of the deadline for complying with its new radiofrequency (RF) radiation rules adopted in the above captioned docket. In the alternative, Ameritech requests that the Commission immediately grant its January 23, 1997 Petition for Partial Reconsideration of the Commission's First Memorandum Opinion and Order in ET Docket No. 93-62, Mimeo No. FCC 96-487, (December 24, 1996). Under either approach, the Commission should revise the compliance deadline so that it falls due one year after the issuance of revised OET Bulletin No. 65.

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Ameritech, through its subsidiaries and affiliates, (shown in Attachment A hereto)¹ is licensed to provide cellular, paging and Personal Communications Service (PCS). The original compliance deadline for the new RF radiation rules (adopted by the Commission's July 31, 1996 Report and Order in this proceeding) was January 1, 1997. In its September 6, 1996 Petition for Reconsideration and Clarification, Ameritech requested inter alia that the Commission extend the compliance deadline (originally scheduled for January 1, 1997) to fall due one year after the release of the updated OET Bulletin No. 65. This measure is necessary because the Commission's new RF radiation rules contain a number of ambiguities and complex issues, and the industry will need the guidance to be provided by the updated Bulletin No. 65 in order to accurately evaluate their compliance with the new rules. Several other industry members made this same request. See First Memorandum Opinion and Order, supra at ¶ 5. A number of the issues and ambiguities are described in Ameritech's September 6, 1996 Petition. In its January 23, 1997 Petition for Partial Reconsideration, Ameritech repeated its request that the extension period be tied to the release of the revised Bulletin.

The Commission recognized the difficulties in achieving compliance by January 1, 1997, and its First Memorandum Opinion and Order granted an eight month extension of this deadline. However, given the complex nature of the

¹ Attachment A lists the licensee entities, as well as certain intermediate affiliates.

many issues raised on reconsideration of the Commission's July 31, 1996 Report and Order in this proceeding, it has taken several months for the Commission to draft a reconsideration order, and the revised OET Bulletin No. 65. While these documents have apparently been drafted, they have not yet been issued. Therefore, despite the Commission's well intended extension, it is clear that the industry will not have adequate time to comply with the new RF radiation rules. Ameritech alone must evaluate the compliance of hundreds of transmitters. While Ameritech has diligently taken steps to verify the compliance of many of these base stations, where such evaluation could be completed under the "safe harbor" guidelines in the rules, several operations are located at rooftop sites which require more complex calculations and/or measurements. Ameritech has cellular, paging and PCS transmitters located on large downtown buildings in virtually all of the significant markets within its service region. Many of these buildings have a substantial number of antennas on the rooftop, making it difficult to determine compliance. Indeed, because the Commission's rules are ambiguous as to the responsibilities of individual licensees in a multiple transmitter situation, and because many cellular, PCS and paging facilities can be installed without notification to the Commission, it may take a long time to obtain accurate information on all of the radio operations on a given rooftop, in order to evaluate the relevant RF levels.

The Commission's First Memorandum Opinion and Order concurred with the need for a longer transition period, but stated that "we believe that it would be unnecessary, in most circumstances, to extend the transition period for a full year or more after a revised Bulletin No. 65 is issued." Id. at ¶ 8. The Commission did not elaborate on this conclusion. Ameritech observed in its Petition that, for the numerous licensees that are authorized to operate hundreds or even thousands of base stations, an eight month extension is likely to prove inadequate, especially given the lack of guidance provided on certain key issues by the July 31, 1996 Report and Order. With the passage of seven months, such licensees will not be able to digest the Commission's resolution of these issues in time to meet the September 1, 1997 deadline. Since the reconsideration order has still not been scheduled for a vote, and since the resolution of the complex issues raised on reconsideration is likely to require many licensees to "start from square one" in evaluating their rooftop sites, it is respectfully submitted that an extension based on the resolution of these issues (presumably in revised Bulletin No. 65) would be a more prudent course of action. Such extension should be for at least one year. Such outcome is further justified by the fact that the current freeze on the filing of notification applications by paging and specialized Mobile Radio Service licensees may complicate compliance efforts, where relocating or raising the height of an antenna is a necessary solution to an RF exposure problem.

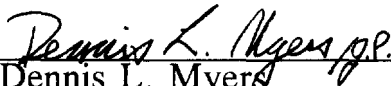
Extension of the compliance deadline in the case at hand is supported by previous FCC decisions extending compliance deadlines pending FCC action on issues affecting the parties' ability to comply. See, e.g., Nextwave Personal Communications, Inc., FCC 97-1040, File Nos. 00341CWL96 et al., 1997 FCC LEXIS 2593 (Wireless Tel. Bur. May 16, 1997) (extending deadline for compliance with foreign ownership requirements pending the Commission's rulemaking proceeding concerning the implementation of the WTO Agreement which would change the Commission's foreign ownership restrictions); U S WEST Communications, Inc., 10 FCC Rcd. 640 (Com. Car. Bur. 1994) (extending deadline for compliance with single bill requirement for all local exchange carriers pending the FCC's decision on two waiver requests concerning the single bill requirement).

In the event that the Commission does not see fit to grant a blanket extension, Ameritech requests that the Commission grant the Company a temporary waiver of the September 1, 1997 deadline, for the reasons set forth above. Similar waivers should be granted to any licensee that must evaluate numerous transmitters, or that experiences delays in obtaining information about other radio operations at a given antenna site, if these delays are beyond the control of the entity performing the environmental compliance review. A flexible approach by the FCC would help to give licensees assurance that they will be given a fair opportunity to meet the Commission's new requirements.

Conclusion

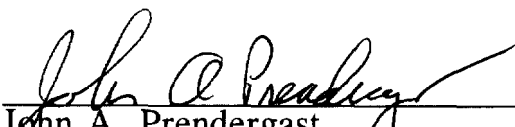
In light of the foregoing, Ameritech requests that the Commission extend the compliance deadline as specified above, or grant a waiver for a one year period from the release of the revised OET Bulletin No. 65.

Respectfully submitted,



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Attachment A.



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Filed: August 15, 1997

Ameritech Mobile Communications, Inc. owns 100% of the stock of Ameritech Mobile Services, Inc., a Delaware corporation with principal offices at 2000 West Ameritech Center Drive, Hoffman Estates, Illinois 60195-5000. Ameritech Mobile Services, Inc. has acquired or is in the process of acquiring ownership or control of Paging, Air-To-Ground, Maritime and IMTS services licensed by the Commission.

Ameritech Mobile Communications, Inc. also is the sole shareholder of CyberTel Financial Corporation, which in turn, through its subsidiary Ameritech Mobile Services, Inc. owns St. Louis Paging Corporation and CyberTel Minneapolis Paging Corporation, both in the paging business, and companies which own interests in partnerships providing cellular services.

Ameritech Mobile Communications, Inc. also has the following wholly-owned subsidiaries which act as the general partner in partnerships engaged in providing cellular service:

- Ameritech Mobile Phone Service of Chicago, Inc.
- Ameritech Mobile Phone Service of Detroit, Inc.
- Ameritech Mobile Phone Service of Cincinnati, Inc.
- Ameritech Mobile Phone Service of Illinois, Inc.
- Ameritech Mobile Communications of Wisconsin, Inc.

Ameritech Mobile Communications, Inc. and its subsidiaries have interests in the following licensee partnerships:

- Chicago SMSA Limited Partnership
- Detroit SMSA Limited Partnership
- Cincinnati SMSA Limited Partnership
- Illinois SMSA Limited Partnership
- Milwaukee SMSA Limited Partnership
- Madison SMSA Limited Partnership
- Illinois RSA 6 & 7 Limited Partnership
- CyberTel Cellular Telephone Company
- CyberTel RSA Cellular, L.P.
- Toledo MSA Limited Partnership
- Illinois Valley Cellular RSA 2 - III Partnership
- Cellular North Michigan Network General Partnership
- Thumb Cellular Limited Partnership (RSA 10)
- Youngstown-Warren MSA Limited Partnership
- Century Cellunet of Battle Creek MSA Limited Partnership
- Century Cellunet of Saginaw MSA Limited Partnership
- Century Cellunet of Michigan, RSA #6 Cellular Limited Partnership
- Century Cellunet of Southern Michigan Cellular Limited Partnership
- Century Cellunet of Lansing MSA Limited Partnership
- Century Cellunet of Jackson MSA Limited Partnership
- Cellular Mobile Systems of Michigan RSA #7 Limited Partnership
- Michigan RSA #9 Limited Partnership
- B-Side Carriers Limited Partnership
- GTE Mobilnet of Indiana Limited Partnership
- GTE Mobilnet of Ohio Limited Partnership
- Rockford MSA Limited Partnership

Ameritech Corporation has the following wholly-owned subsidiaries. Additional subsidiaries of these corporations are also listed.

Illinois Bell Telephone Company

Ameritech Illinois Metro, Inc. (filed cert. of inc. 3/14/97)

Indiana Bell Telephone Company, Inc.

Michigan Bell Telephone Company

The Ohio Bell Telephone Company

Wisconsin Bell, Inc.

Ameritech Services, Inc.^{1/}

Ameritech Center Phase I, Inc. (jointly owned by AIT and ASI)

Ameritech Advanced Data Services of Illinois, Inc.

Ameritech Advanced Data Services of Indiana, Inc.

Ameritech Advanced Data Services of Michigan, Inc.

Ameritech Advanced Data Services of Ohio, Inc.

Ameritech Advanced Data Services of Wisconsin, Inc.

Ameritech Capital Funding Corporation

Ameritech Communications, Inc.

Ameritech Communications International, Inc.

Ameritech Communications of Illinois, Inc.

Ameritech Communications of Indiana, Inc.

Ameritech Communications of Ohio, Inc.

Ameritech Communications of Wisconsin, Inc.

Ameritech Global Gateway Services, Inc.

Ameritech Credit Corporation

Ameritech Belgium Leasing, Inc.

Joseph International Sales, Inc.

Ameritech Development Corporation

Ameritech Information Industry Services, Inc.

Energy Oasys L.L.C.

Quantum Control Systems, L.L.C.

Ameritech Information Systems, Inc.

Ameritech EGA, Inc.

Ameritech Health Connections, Inc.

Ameritech Health Information Management Corporation of Ohio

Ameritech Health Information Management Corporation of Tennessee

Ameritech Knowledge Data, Inc.

Dynix Corporation

Ameritech Library Services, Inc.

Dynix Library Systems, Inc.

Dynix Library Systems (UK), Ltd.

Dynix Library Systems (Ireland), Ltd.

Dynix (France), S.A.

Dynix (Chile), Limitada

Health Network Ventures, Inc.

Wisconsin Health Information Network, Inc.

^{1/} Ameritech Services, Inc. is owned by Illinois Bell Telephone Company, Indiana Bell Telephone Company, Inc., Michigan Bell Telephone Company, The Ohio Bell Telephone Company and Wisconsin Bell, Inc.

Ameritech International Inc.

Wer Liefert Was?

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Ameritech Australia PTY Limited

Ameritech International China, LLC (jointly owned by Ameritech Int'l and Ameritech Int'l

Bus. Dev. Corp.)

Ameritech International Holdings Company

Ameritech International Business Development Corporation

Polska Telefonia Komorkowa

Ameritech Kidsoft Holdings, L.L.C.

Ameritech Long Distance Industry Services, Inc.

Ameritech Managed Services, Inc.

Ameritech Media Ventures, Inc.

Ameritech Mobile Communications, Inc.

AMCI Partnership Holdings, Inc.

Ameritech Mobile Communications of Wisconsin, Inc.

Ameritech Mobile Data, Inc.

Ameritech Mobile Phone Service of Chicago, Inc.

Ameritech Mobile Phone Service of Cincinnati, Inc.

Ameritech Mobile Phone Service of Detroit, Inc.

Ameritech Mobile Phone Service of Illinois, Inc.

Metrocom Communications, Inc.

CyberTel Financial Corporation

Ameritech Mobile Services, Inc.

Ameritech Mobile Services of Wisconsin, Inc.

CyberTel Minneapolis Paging Corporation

CyberTel St. Louis Paging Corporation

Ohio Paging Units, Inc

CyberTel Corporation

CyberTel Cellular Management Company

GSAA, Inc.

Gensub, Inc.

Hawaiian Cellular Properties, Inc.

Ameritech Monitoring Services, Inc.

SecurityLink from Ameritech, Inc.

National Guardian Electronic Services S.A. de C.V. (Mexico)

National Guardian Security Services, Inc. (Canada)

National Guardian Security Services Corp. of Puerto Rico

Ameritech New Media, Inc.

Ameritech New Zealand Funding Corporation

Ameritech Belgium Funding Corporation

Ameritech International Belgium, L.L.C. (jointly owned by ANZFC and ANZI)

Ameritech New Zealand Investments, Inc.

Ameritech Belgium Investments, Inc.

Ameritech Holdings Limited

HKP Partners of New Zealand

SKY Network Television Limited

Telecom Corporation of New Zealand Limited

Ameritech Payphone Services, Inc.

Ameritech Payphone Services of Illinois, Inc.

Ameritech Payphone Services of Indiana, Inc.

Ameritech Payphone Services of Michigan, Inc.

Ameritech Payphone Services of Ohio, Inc.

Ameritech Payphone Services of Wisconsin, Inc.

Ameritech Publishing, Inc.

Ameritech Interactive Media Services, Inc.

Ameritech Publishing of Illinois, Inc.

Starline Insurance Company

Ameritech Telecommunications Services Company

Ameritech Wireless Communications, Inc.

Ameritech Information Technologies Corporation (Nevada)

Ameritech Communications, Inc. (Nevada)

Ameritech Corporation (Nevada)

Ameritech Credit Corporation (Nevada)

Ameritech Global Link, Inc. (Nevada)

CERTIFICATE OF SERVICE

I, Sharmon B. Truesdale, do hereby certify that I have, on this 15th day of August 1997, caused to be served by first class U.S. mail, postage prepaid, a copy of the foregoing Petition for Partial Reconsideration to the following:

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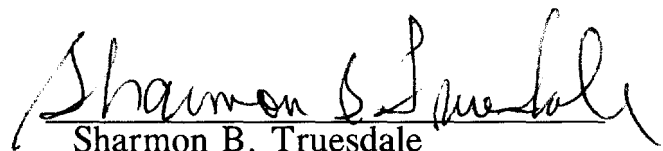
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